

FEB 18 2008

United States District Court
Northern District of Illinois

2008 FEB 15 PM 2:19

Diane M. Dillon Phillips,

Plaintiff,

vs.

Thresholds Psychiatric Rehabilitation Centers,
an Illinois not for profit corporation,

Defendant.

CLERK
U.S. DISTRICT COURT

Case No. 07C6461

Judge David Coar

Magistrate Judge Michael Mason

Answer

The Defendant, The Thresholds (named as Thresholds Psychiatric Rehabilitation Centers and referred to in this document as "Thresholds" or "Defendant"), in Answer to the Complaint of Employment Discrimination ("Complaint") filed by the Plaintiff, Diane M. Dillon Phillips (referred to in this document as "Phillips" or "Plaintiff"), states as follows:

1. Answering paragraph 1 of the Complaint, the Defendant admits the Complaint alleges employment discrimination, but denies the legal sufficiency of the Complaint.
2. Answering paragraph 2 of the Complaint, the Defendant admits the averments of paragraph 2.
3. Answering paragraph 3 of the Complaint, the Defendant admits the it is located at 4101 N. Ravenswood, Chicago IL 60613, and asserts the Defendant is properly named The Thresholds, an Illinois not for profit corporation. The Defendant further admits that it previously employed the Plaintiff.
4. The Complaint lacks a paragraph 4.
5. Answering paragraph 5 of the Complaint, Defendant admits that the Plaintiff was employed with the Defendant, and no longer so employed.
6. Answering paragraph 6 of the Complaint, Defendant denies that the Plaintiff was discriminated against on April 24, 2007 or any other date.
7. Answering paragraph 7 (marked 7.1) of the Complaint, Defendant admits that the Plaintiff filed a charge with the Illinois Department of Human

Rights but has no knowledge as to whether a charge was filed with the EEOC.

8. Answering paragraph 8 of the Complaint, Defendant admits that the EEOC issued a Notice of Right to Sue.
9. Answering paragraph 9 of the Complaint, Defendant each and every averment, and denies that the Plaintiff was discriminated against in any way.
10. Answering paragraph 10 of the Complaint, Defendant denies that it is a governmental entity.
11. Answering paragraph 11 of the Complaint, Defendant denies that the Plaintiff has alleged fact sufficient to confer jurisdiction under the statutes listed in paragraph 11.
12. Answering paragraph 12 of the Complaint, Defendant denies each and every averment contained therein.
13. Answering paragraph 13 of the Complaint, Defendant denies the averment contained therein.
14. Answering paragraph 14 of the Complaint, Defendant denies each and every averment contained therein.
15. Paragraph 15 of the Complaint requests a jury trial and does not contain factual allegations.
16. Answering paragraph 16 of the Complaint, Defendant denies the averments contained therein and denies that Plaintiff is entitled to any relief.

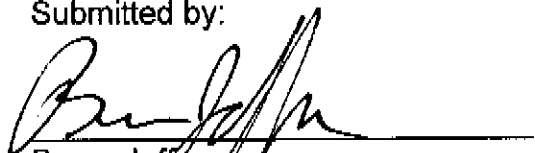
Affirmative Defenses

As and for separate affirmative defenses to the this Complaint the Defendant alleges as follows;

1. The Plaintiff's Complaint may fail to state a claim upon which relief may be granted.
2. The Plaintiff was terminated by the Defendant for legitimate and non-discriminatory reasons.

Wherefore, the Defendant, Thresholds requests Judgment for the Defendant and against the Plaintiff and for all other relief that may be just and proper.

Submitted by:

A handwritten signature in black ink, appearing to read "Bruce Jefferson", is written over a horizontal line.

Bruce Jefferson
General Counsel for The Thresholds
4101 North Ravenswood
Chicago IL 60613
773-572-5210
Attorney Reg. No. 6185531

2-15-08
Date

Certification of Service

I certify that the attached Answer of The Thresholds was sent this day by 1st Class US Mail to the Plaintiff at the following address:

Diane M. Dillon Phillips
2138 West 114th Place,
Chicago, Illinois 60643.


Bruce Jefferson
Attorney for Thresholds

2-15-08
Date